



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 02 2015

CERTIFIED MAIL #7009 1680 0000 7677 8190
RETURN RECEIPT REQUESTED

Mr. Roger Tambling
General Manager
Valmont Coatings, Inc. – Empire Galvanizing
10909 Franklin Avenue
Franklin Park, Illinois 60131

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No.: ILD 070 012 265

Dear Mr. Tambling:

On February 11, 2015 a representative of the U.S. Environmental Protection Agency inspected the Valmont Coatings, Inc. – Empire Galvanizing (Valmont Coatings) facility located in Franklin Park, Illinois. As a large quantity generator of hazardous waste, Valmont Coatings is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Valmont Coatings' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Valmont Coatings, EPA's review of records pertaining to Valmont Coatings, and the inspector's observations, EPA has determined that Valmont Coatings has unlawfully stored hazardous waste without a permit or interim status as a result of Valmont Coatings' failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Valmont Coating was out of compliance at the time of the inspection in paragraphs 1-3, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The

exemption condition identified in paragraph 1 is also an independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Valmont Coatings to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS]

At the time of the inspection, Valmont Coatings was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraph 1 is also independent TSD requirements violated by Valmont Coatings:

Training

1. A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a) (4) and 725.116(a) [40 C.F.R. §§ 262.34(a) (4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a) (4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a) (4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a) (4) and 725.116(d) [40 C.F.R. §§ 262.34(a) (4) and 265.16(d)].

At the time of the inspection, Valmont Coatings did not have and was unable to provide job titles for each position at the facility related to hazardous waste management.

At the time of the inspection, Valmont Coatings did not have a written job description for each position at the facility related to hazardous waste management.

At the time of the inspection, Valmont Coatings did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management.

At the time of the inspection, Valmont Coatings did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management at the facility.

Contingency Plan

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital and state and local emergency response teams that may be called upon to provide emergency services. *See*, 35 IAC §§ 722.134(a) (4) and 725.153(b) [40 CFR §§ 262.34(a) (4) and 265.53(b)].

At the time of the inspection, Valmont Coatings had not submitted a copy of the facility contingency plan and revisions to the plan to the local police department and hospital that may be called upon to provide emergency services.

Use and Management of Containers

3. A large quantity generator who accumulates greater than 55-gallons of hazardous waste at or near any point of generation must clearly label the containers with an accumulation start date and, within three days, move the containers to the hazardous waste storage area. *See*, 35 IAC 722.134 (c) [40 CFR § 262.34(c)(2)].

At the time of the inspection, Valmont Coatings was accumulating greater than 55-gallons of acid sludge waste in containers that were not marked with the accumulation start date at the galvanizing (pickle) line. However, at the time of the inspection, Valmont Coatings marked one of the 55-gallon containers of acid tank sludge with an accumulation start date and moved the container to the 90-day hazardous waste storage area.

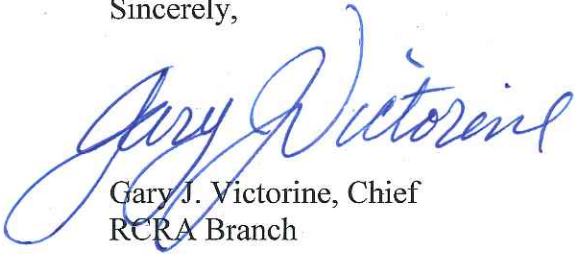
Summary: By failing to comply with the conditions for a permit exemption, above, Valmont Coatings became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Valmont Coatings failed to apply for such a permit. Valmont Coatings' failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Valmont Coatings to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 and 2, above.

During the inspection, as observed by EPA, you took certain actions to establish compliance with the use and management of containers requirement. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1 and 2. You should submit your response to Sheila Burrus, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at 312-886-3587 or at burrus.sheila@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.211)		725.211
(725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____ 	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No <u> X </u> N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No <u> X </u> N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? <ul style="list-style-type: none"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? <ul style="list-style-type: none"> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the plan on-site?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
722.134(c)	<p>Section 722.134 Satellite Accumulation</p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
722.134(g)	<p>Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<p>SUBPART D: RECORDKEEPING AND REPORTING</p>	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years:</p> <p>- a copy of each signed manifest?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <p>- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p>Section 722.141 Annual Reporting</p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Section 722.142 Exception Reporting	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	722.143
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	722.150
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART G: FARMERS	722.160
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	COMMENTS:	722.170

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Valmont Coatings, Inc. – Empire Galvanizing Plant

U.S. EPA ID. No.: ILD 070 012 265

LOCATION ADDRESS: 10909 Franklin Avenue
Franklin Park, Illinois 60131

DATE OF INSPECTION: February 11, 2015

U.S. EPA INSPECTOR: Sheila Burrus

PREPARED BY:

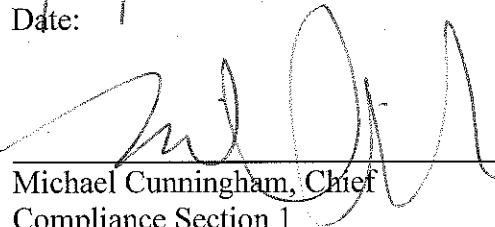


Sheila Burrus
Environmental Protection Specialist

2/23/15

Date:

REVIEWED BY:



Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

2/24/15

Date:

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced compliance evaluation inspection (CEI) at Valmont Coatings, Inc. – Empire Galvanizing (Valmont Coatings), located at 10909 Franklin Avenue, Franklin Park, Illinois, to evaluate Valmont Coatings compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste and used oil.

Participants: Michael Small, Operations Manager, Roger Tambling, General Manager, Anup Ruia, Director of Lean, Jerry Hill, Continuous Improvement Manager and Carol Belpedio, Accounting Manager represented Valmont Coatings. Sheila Burrus represented EPA Region 5.

Installation Description/Background

Valmont Coatings is a hot dip zinc custom galvanizing facility. Product types includes pipe and fabricated products. The products requiring galvanizing go through a series of caustic, acid, rinse and galvanizing dips. The facility uses an acid reclamation system to remove impurities from sulfuric acid used in the galvanizing process and then returns the reclaimed acid back to the process tank. Valmont Coatings has two active galvanizing lines which consists of a pickle line for the processing of large parts (poles) and a spin line for the processing of small parts (nuts/bolts). There also is a kettle line for dipping (coating) steel product into zinc. Some of its customers are Eaton Corporation, Atkore Corporation and General Sheet Metal.

Valmont Coatings' 90-day hazardous waste storage area is located on the northwest side of the building. Valmont Coatings has satellite accumulation areas located within the spin line, pickle line and clean-in-stack areas. Valmont Coatings' last hazardous waste shipment was on February 11, 2014.

Valmont Coatings was last inspected by the Illinois Environmental Protection Agency on November 29, 2010

A review of hazardous waste manifests and waste volume on-site indicates that Valmont Coatings has been operating as a large quantity generator.

Waste Generation

The facility generates process sludge (D002/D005/D007), acid tank sludge (D002), caustics sludge (D002), ink solvent, flux tank sludge (D005) and bright galvanizing liquid (D001).

The process sludge (D002, D005, and D007) is generated from cleanout of solids from the bottom of various tanks in the galvanizing process. The acid tank sludge (D002) is generated from cleanout of solids from the bottom of the acid dip tank in the galvanizing operation. The caustics sludge (D002) is generated from cleanout of solids from the bottom of the caustic dip tank in galvanizing operation. The ink solvent is generated from cleaning the ink jet printer. The flux tank sludge (D005) is generated from cleanout of solids from the bottom of the flux dip tank. The bright galvanizing waste flammable liquid (D001) is generated from the draining of aerosol cans.

Valmont Coatings generates used oil from maintenance operations. Universal waste lamps are also generated on-site.

Opening Conference

I arrived at Valmont Coating at 8:30 a.m. on February 11, 2015. I introduced myself to the receptionist who contacted Michael Small. I presented my enforcement officer credentials to Mr. Small and explained to him the purpose of my visit. I was then escorted to a conference room where I began to explain that I would be conducting a CEI that included a visual site inspection (VSI) and records review. I then proceeded to conduct the opening conference by explaining to him what specific records I would need to review. We were then joined by Roger Tambling. Mr. Small left the meeting for approximately 10 minutes before returning with Jerry Hall.

I informed Mr. Tambling during Mr. Small absence that Valmont coatings could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal communication, documents and photographs. Valmont Coatings did not make a CBI claim on the information gathered during the inspection.

I asked Messrs. Small, Tambling and Hall for a brief description of the type of work done at this installation and the types of wastes generated. They began to provide background and waste stream information about Valmont Coatings which is included above in the installation description/background section of this report.

I provided a Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention State Contact list, Illinois Sustainable Technical Center Brochure and the U.S. EPA Managing Used Oil Advice for Small Business brochure to Mr. Roger Tambling.

We were joined by Anup Ruia and then later by Carol Belpedio. I continued the opening conference by asking who picks up Valmont Coatings' hazardous waste, used oil and universal waste. Mr. Ruia indicated that Univar USA, Inc. located in Bedford Park, Illinois or Thunderbird Trucking, LLC. located in East Chicago, Illinois is responsible for picking up its hazardous waste, used oil and universal waste lamps and transporting to Tradebe Environmental Services, LLC located in Gary, Indiana, for recycling and disposal.

I began the CEI by conducting the visual site portion of the inspection.

Visual Site Inspection

I was accompanied by Messrs. Ruia, Small and Tambling during the VSI. The areas of the Valmont Coating facility inspected include, but were not limited to: staging area, 90-day hazardous waste storage area, kettle line, galvanizing spin line, galvanizing pickle line, zinc storage area, hot-end wire cage area, clean-in-stack area and maintenance room.

The following is a summary of information obtained while touring the facility.

- There were two closed/labeled 55-gallon satellite accumulation containers of hazardous waste acid tank sludge located at the galvanizing pickle line (Photographs 1-3). Neither of the containers were marked with an accumulation start date. I informed Mr. Ruia that the satellite accumulation area contained greater than 55-gallons of hazardous waste. At the time of the inspection, Mr. Ruia had an employee mark one of the 55-gallon containers of acid waste with an accumulation start date and move the container immediately to the 90-day hazardous waste storage area.
- There were three closed/labeled 55-gallon satellite accumulation containers of acid tank sludge and two 1-cubic yard tote bags of process sludge located in the 90-day hazardous waste storage area (Photographs 4-5).
- There was a closed/labeled 55-gallon satellite accumulation container of floor sweepings located west side of the building (Photograph 6).
- There was one closed/labeled 55-gallon satellite accumulation container of process sludge/floor sweepings and one container of product (small parts) near the spin line (Photographs 7-8)
- There was a closed/labeled 55-gallon satellite accumulation container of bright galvanizing liquid (waste flammable liquid) located in the clean-in-stack area (Photographs 9-10).
- There was one closed/labeled 55-gallon satellite accumulation container of ink solvent and product located in the clean-in-stack area (Photographs 11-13).
- There was one closed/labeled container of waste lamps located next to the maintenance shop (Photograph 14).
- There was one closed/labeled 55-gallon drum of used oil located in the maintenance shop (Photograph 15).
- Additional photographs of the numerous departments throughout the facility (Photographs 16-22).

Records Review

For the records review, I requested the most current hazardous waste contingency plan, hazardous waste manifests, land disposal restriction forms, waste analysis data, hazardous waste training records, annual reports and weekly inspection logs for the 90-hazardous waste storage areas.

Contingency Plan

I reviewed Valmont Coatings Release Prevention Control and Countermeasure Plan dated August 2014, and found it to be complete.

Valmont Coatings was unable to provide documentation showing that a copy of the RPCC plan had been sent to police department and hospital.

Weekly Inspections Logs

Carol Belpedio stated that weekly inspections are conducted in the 90-day hazardous waste storage area. Valmont Coatings started documenting inspections in the year 2014.

Training Records/Job Description

Valmont Coatings was unable to provide job title, a written description for each position and a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management.

I reviewed waste analysis, annual reports and land disposal restriction forms. Valmont Coatings is properly maintaining these records on site as required for large quantity generators.

In walking through the Valmont Coatings facility, I observed the presence of fire extinguishers and eye wash stations.

Closing Conference

In closing, a brief exit conference was held. I summarized where Messrs. Ruia, Small and Tambling had taken me during the VSI and what information was presented to me. I thanked everyone in attendance for their cooperation and concluded the CEI at approximately 1:35 p.m.

Attachments

Inspection Checklist
Photographs 1 through 22



PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

galvanizing pickle line

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. – Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 2

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

galvanizing pickle line

SCENE BEING PHOTOGRAPHED:

two closed/labeled 55-gallon satellite accumulation
containers of acid tank sludge

SITE LOCATION:

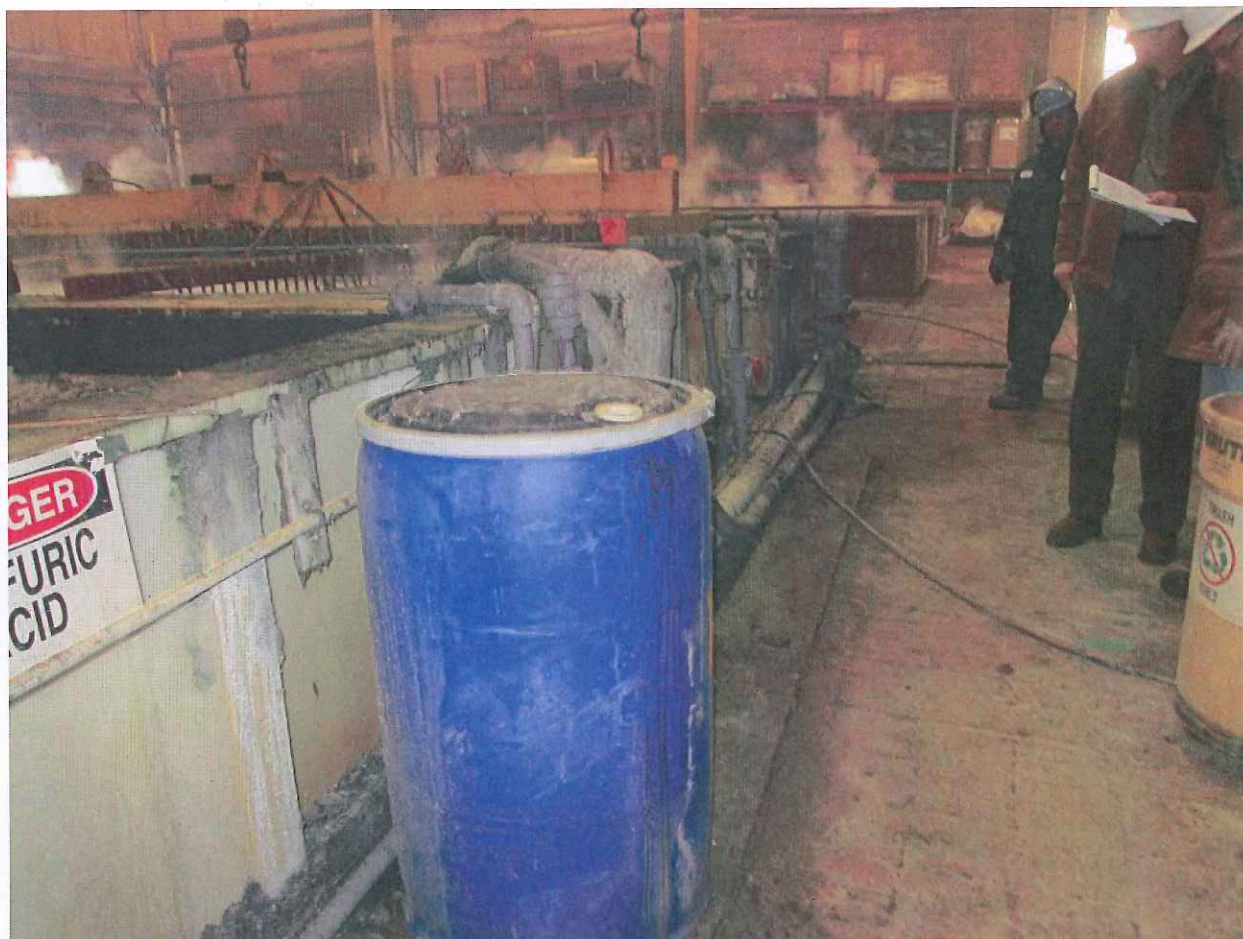
10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

galvanizing pickle line

SCENE BEING PHOTOGRAPHED:

second drum of acid tank sludge waste was moved to
90-day hazardous waste storage area

SITE LOCATION:

10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 4
NAME OF PHOTOGRAPHER: Sheila Burrus
DATE OF PHOTOGRAPH: February 11, 2015
LOCATION OF PHOTOGRAPH: 90-day hazardous waste storage area
SCENE BEING PHOTOGRAPHED: closed/labeled three, 55-gallon containers of acid tank sludge
SIITE LOCATION: 10909 Franklin Avenue
Franklin Park, Illinois 60131
INSTALLATION NAME: Valmont Coatings, Inc. - Empire Galvanizing
INSTALLATION I.D. #: ILD 070 012 265



PHOTOGRAPH: 5

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

90-day hazardous waste storage area

SCENE BEING PHOTOGRAPHED:

two closed/labeled 1-cubic yard tote bags of acid tank
sludge/sweepings

SITE LOCATION:

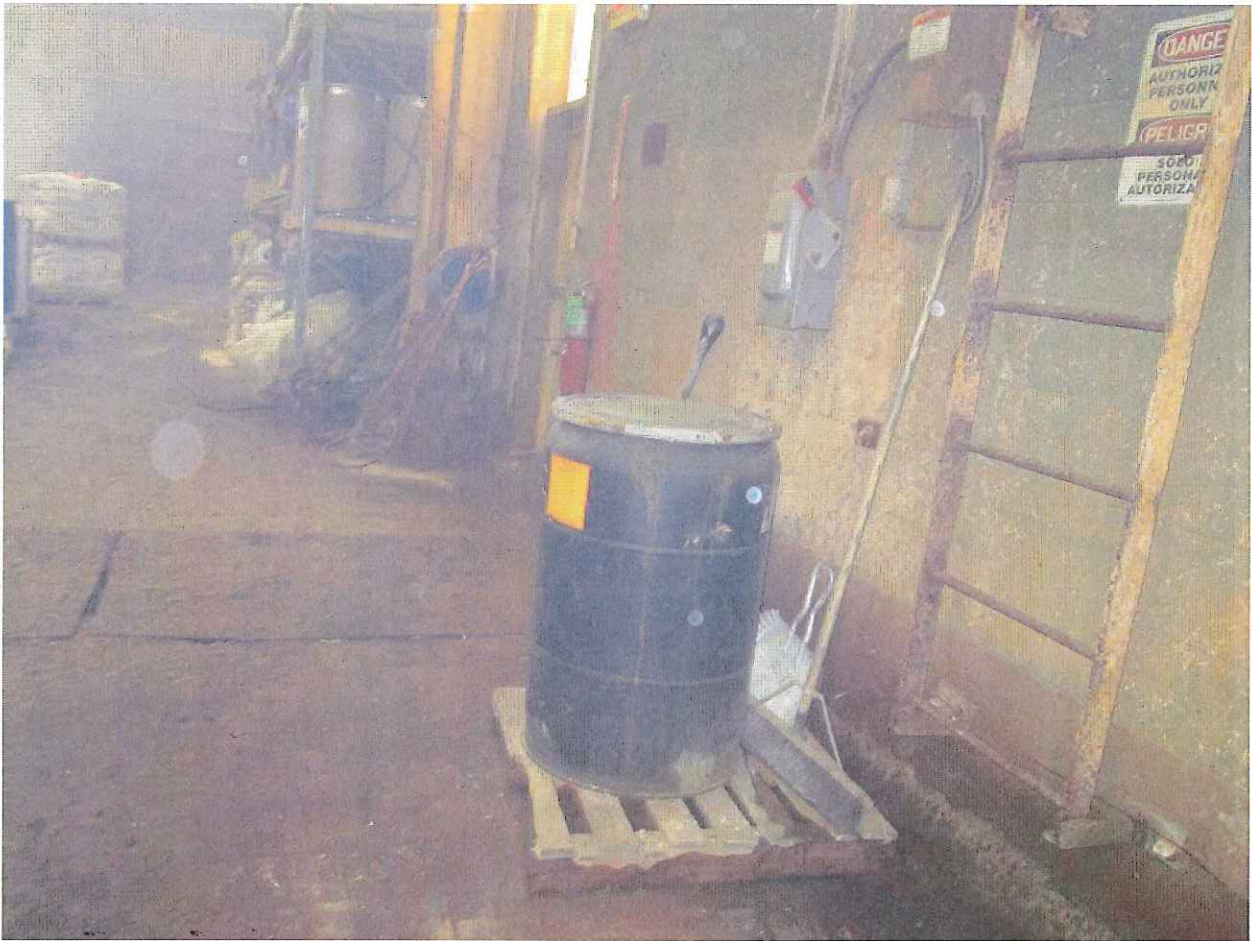
10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 6

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

West End of Building

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon container of hazardous waste
floor sweepings

SITE LOCATION:

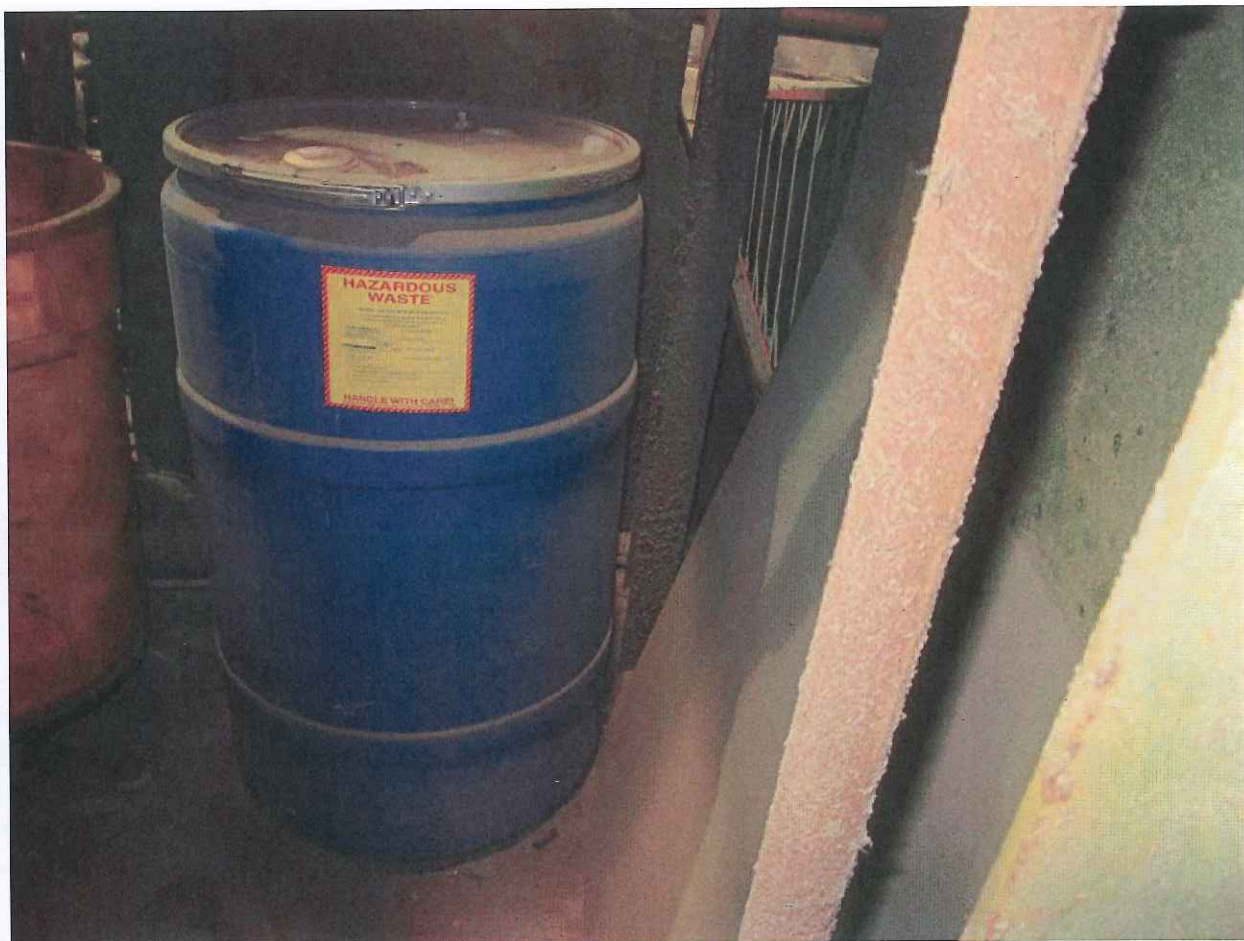
10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 7

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Spin line

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon satellite accumulation
container of process sludge/floor sweepings

SITE LOCATION:

10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 8

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

near spin line

SCENE BEING PHOTOGRAPHED:

small parts

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 9

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Clean-in-Stack Area

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon satellite accumulation container of bright galvanizing liquid waste from the draining of aerosol cans

SITE LOCATION:

10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 10

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Clean-in-Stack Area

SCENE BEING PHOTOGRAPHED:

extruded aerosol cans

SITE LOCATION:

10909 Franklin Avenue

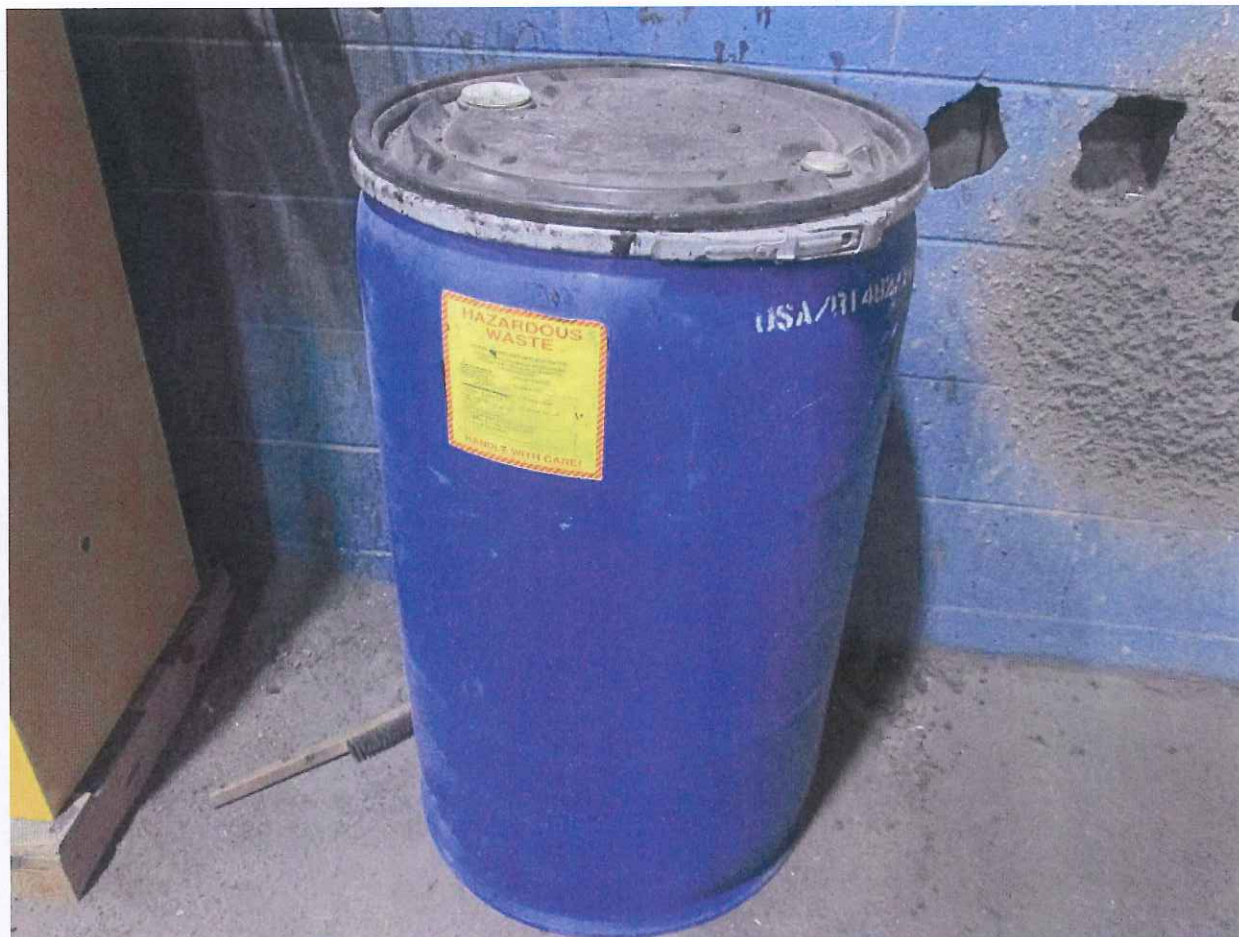
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 11

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Clean-in-Stack Area

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon container of waste ink

SITE LOCATION:

10909 Franklin Avenue
Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 12

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Clean-in-Stack Area

SCENE BEING PHOTOGRAPHED:

Product

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 13

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Clean-in-Stack Area

SCENE BEING PHOTOGRAPHED:

Product

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc.

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 14

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

near maintenance room

SCENE BEING PHOTOGRAPHED:

closed/labeled container of universal waste lamps

SITE LOCATION:

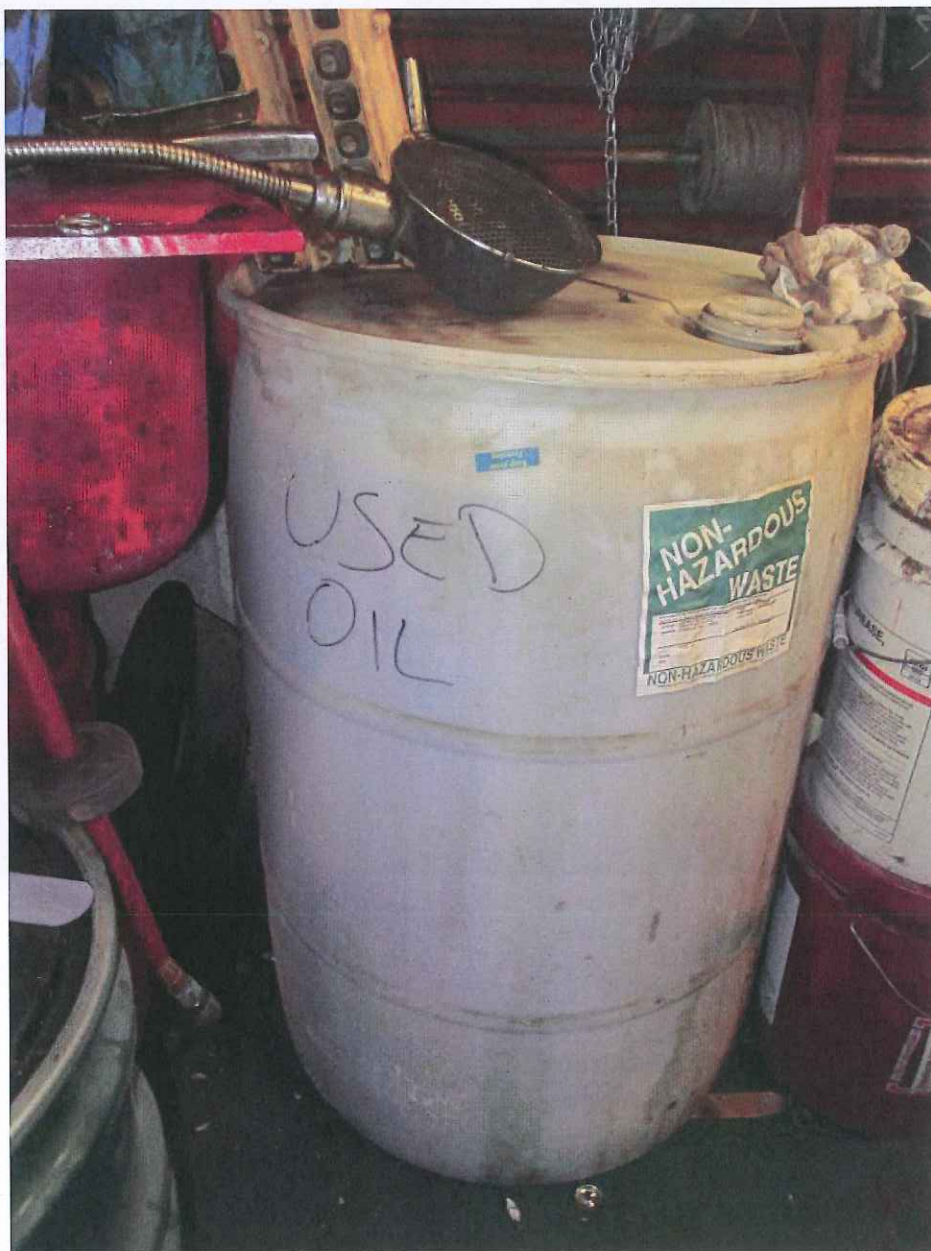
10909 Franklin Avenue
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PHOTOGRAPH: 15

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Maintenance Room

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon drum of used oil

SITE LOCATION:

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Franklin Park, Illinois 60131

INSTALLATION NAME:

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INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 16

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Staging Area

SCENE BEING PHOTOGRAPHED:

incoming product (couplers)

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 17

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Staging Area

SCENE BEING PHOTOGRAPHED:

Incoming product

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 18

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Staging Area

SCENE BEING PHOTOGRAPHED:

product (poles)

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 19

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Zinc Storage Area

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 20

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

kettle line

SCENE BEING PHOTOGRAPHED:

poles dipped in zinc

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

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INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 21

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Outdoors (near baghouse)

SCENE BEING PHOTOGRAPHED:

container of non-hazardous waste filter cake sludge

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

Valmont Coatings, Inc. - Empire Galvanizing

INSTALLATION I.D. #

ILD 070 012 265



PHOTOGRAPH: 22

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

February 11, 2015

LOCATION OF PHOTOGRAPH:

Outdoors (Baghouse)

SCENE BEING PHOTOGRAPHED:

two 55-gallon containers of non-hazardous waste dust

SITE LOCATION:

10909 Franklin Avenue

Franklin Park, Illinois 60131

INSTALLATION NAME:

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INSTALLATION I.D. #

ILD 070 012 265